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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO.

v.

HON.

D-1 TOMO DUHANAJ,  
a/k/a "Tom Duhani,"

VIO. 18 U.S.C. § 1512

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

**COUNT ONE: (Witness Tampering – 18 U.S.C. § 1512)**

D-1 TOMO DUHANAJ

That from on or about May 31, 2012 through on or about July 17, 2012, within the Eastern District of Michigan, Southern Division, TOMO DUHANAJ, also known as "Tom Duhani," defendant herein, knowingly corruptly persuaded, and attempted to corruptly persuade, Enver Jusufi with intent to hinder, delay and prevent the communication to a law enforcement officer of information related to the commission

of a federal offense, all in violation of Title 18, United States Code, Section 1512(b).

A TRUE BILL.

/s Grand Jury Foreperson

Dated: 9/12/12

BARBARA L. MCQUADE  
United States Attorney

s/ John N. O'Brien II (P39912)  
Chief, Violent Organized Crime Unit

s/ Kenneth R. Chadwell (P39121)  
Assistant United States Attorney

s/ Margaret M. Smith (P71413)  
Assistant United States Attorney

United States District Court  
Western District of Michigan**Criminal Case C**

Case:2:12-cr-20606  
 Judge: Edmunds, Nancy G.  
 MJ: Randon, Mark A.  
 Filed: 09-12-2012 At 03:08 PM  
 INDI USA V SEALED MATTER (EB)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

**Reassignment/Recusal Information** This matter was opened in the USAO prior to August 15, 2008 [ ]

<b>Companion Case Information</b>		<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: KRC <i>KRC</i>

**Case Title:** USA v. TOMO DUHANAJ, a/k/a "Tom Duhani,"

**County where offense occurred :** Oakland County

**Check One:**       **Felony**       **Misdemeanor**       **Petty**

      Indictment/       Information --- **no** prior complaint.  
X Indictment/       Information --- based upon prior complaint [Case number: 12-mj-30488 ]  
      Indictment/       Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

Original case was terminated; no additional charges or defendants.  
 Corrects errors; no additional charges or defendants.  
 Involves, for plea purposes, different charges or adds counts.  
 Embraces same subject matter but adds the additional defendants or charges below:

**Defendant name**      **Charges**      **Prior Complaint (if applicable)**

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

September 12, 2012

Date



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 Assistant United States Attorney  
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 Attorney Bar #: P39121

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.